

THE HONORABLE BENJAMIN H. SETTLE

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

JOHN DOE #1, an individual, JOHN DOE
#2, an individual, and PROTECT
MARRIAGE WASHINGTON,

Plaintiffs,

v.

SAM REED, in his official capacity as
Secretary of State of Washington,
BRENDA GALARZA, in her official
capacity as Public Records Officer for the
Secretary of State of Washington,

Defendants.

No. 3:09-CV-05456-BHS

DECLARATION OF WILLIAM B.
STAFFORD REGARDING INTERVENOR
WASHINGTON FAMILIES STANDING
TOGETHER'S MOTION IN LIMINE

I, William B. Stafford, declare as follows:

1. I am an attorney with Perkins Coie LLP, counsel for Intervenor Washington Families Standing Together ("WAFST") in this lawsuit. I have personal knowledge of the facts set forth in this declaration and am competent to testify to them.

2. On August 19, 2011, the parties conducted a telephonic conference pursuant to Local Civil Rule 7(d)(4) to discuss potential motions in limine. During this conference, WAFST in good faith conferred with Plaintiffs in an effort to resolve the issues presented in WAFST's motion in limine, filed with the Court on the same day as this declaration.

DECL. OF W. STAFFORD RE WAFST'S
MOTION IN LIMINE (No. 3:09-CV-05456-BHS)

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71718-0001/LEGAL21587177.1

Perkins Coie LLP
1201 Third Avenue, Suite 4800
Seattle, WA 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000

1 3. Pursuant to Local Civil Rule 16, the Plaintiffs and State Defendants and
2 Intervenor have exchanged pretrial statements and are presently working towards submission of
3 a proposed pretrial order pursuant to Local Civil Rule 16.1. Plaintiffs' pretrial statement
4 identified 263 exhibits, the great majority of which consists of websites, blog posts, press
5 releases, YouTube videos, and similar material. A true and correct copy of excerpts of Plaintiffs'
6 pretrial statement—reflecting Plaintiffs' proposed trial exhibits and redacted pursuant to the
7 protective order entered by the Court in this matter—is attached as Exhibit A.
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16 I declare under penalty of perjury under the laws of the State of Washington that the
17 foregoing is true and correct.
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19 SIGNED at Seattle, Washington, this 22nd day of August, 2011.
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21 s/ William B. Stafford, WSBA #39849
22 William B. Stafford, WSBA #39849
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CERTIFICATE OF SERVICE

I certify that on August 22, 2011, I electronically filed the foregoing DECLARATION OF WILLIAM B. STAFFORD REGARDING INTERVENOR WASHINGTON FAMILIES STANDING TOGETHER'S MOTION IN LIMINE with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following attorneys of record.

James Bopp, Jr.
Jared Haynie (*admitted pro hac vice*)
Joseph E La Rue (*admitted pro hac vice*)
Bopp Coleson & Bostrom
1 South Sixth Street
Terre Haute, IN 47807-3510
jboppjr@aol.com
sbieniek@bopplaw.com
jlarue@bopplaw.com

Stephen Walter Pidgeon
3002 Colby Avenue, Suite 306
Everett, WA 98201
stephen.pidgeon@comcast.net

Attorneys for Plaintiffs

Duane M Swinton
Leslie R. Weatherhead
Steven Joseph Dixon
Witherspoon Kelley Davenport & Toole
422 W Riverside, Ste 1100
Spokane, WA 99201
dms@wkdtlaw.com
lwlibertas@aol.com
sjd@wkdtlaw.com

*Attorneys for Intervenor Washington
Coalition for Open Government*

Anne Elizabeth Egeler
James Kendrick Pharris
Jay Douglas Geck
Attorney General of Washington
P.O. Box 40100
Olympia, WA 98504-0100
360-753-7085
anneel@atg.wa.gov
jamesp@atg.wa.gov
billc@atg.wa.gov

*Attorneys for Sam Reed and
Brenda Galarza*

1 I certify under penalty of perjury that the foregoing is true and correct.
2
3

4 DATED this 22nd day of August, 2011.
5

6 s/ Kevin J. Hamilton
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8 Kevin J. Hamilton, WSBA No. 15648
9

10 **Perkins Coie LLP**
11

12 1201 Third Avenue, Suite 4800
13

14 Seattle, WA 98101-3099
15

16 Telephone: 206.359.8000
17

18 Facsimile: 206.359.9000
19

20 WStafford@perkinscoie.com
21

22 *Attorneys for Intervenor Washington*
23

24 *Families Standing Together*
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Perkins Coie LLP
1201 Third Avenue, Suite 4800
Seattle, WA 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000

Exhibits

1. "christian BIGOT" letter addressed to
2. News report: Brad Shannon, *Vote on Partners Divides Country*, Olympian, Oct. 18, 2009.
3. Transcript of voice mail messages left by Krystal Mountaine, for
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(812) 232-2434

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Terre Haute, Indiana 47807
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Terre Haute, Indiana 47807
(812) 232-2434

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5 Dated this 9th day of August, 2011.

6 Respectfully submitted,

7
8 /s/ Jared Haynie

9 James Bopp, Jr. (Ind. Bar No. 2838-84)*

10 jboppjr@aol.com

11 Joseph E. La Rue (Ohio Bar No. 80643)*

12 jlalrue@bopplaw.com

13 Jared Haynie (Colo. Bar No. 41751)*

14 jhaynie@bopplaw.com

15 BOPP, COLESON & BOSTROM

16 1 South Sixth Street

17 Terre Haute, Indiana 47807-3510

18 (812) 232-2434

19 *Counsel for All Plaintiffs*

20 **Pro Hac Vice Application Granted*

Stephen Pidgeon

ATTORNEY AT LAW, P.S.

30002 Colby Avenue, Suite 306

Everett, Washington 98201

(360) 805-6677

Counsel for All Plaintiffs

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22
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(812) 232-2434

Certificate of Service

I, Jared Haynie, am over the age of eighteen years and not a party to the above-captioned action.
My business address is 1 South Sixth Street, Terre Haute, Indiana 47807.

On August 9, 2011, I served the foregoing document, described as Plaintiffs' Pretrial Statement,
by emailing a copy of the same to counsel's respective emails below:

(1) Counsel for Defendants Sam Reed and Brenda Galarza:

Anne E. Egeler — anneel@atg.wa.gov
Jay Geck — jayg@atg.wa.gov
William G. Clark — billc2@atg.wa.gov

(2) Counsel for Intervenor Washington Coalition for Open Government:

Steven J. Dixon — sjd@wkdllaw.com
Duane M. Swinton — dms@wkdllaw.com
Leslie R. Weatherhead — lwlibertas@aol.com

(3) Counsel for Intervenor Washington Families Standing Together

Ryan McBrayer — rmcbrayer@perkinscoie.com
Kevin J. Hamilton — khamilton@perkinscoie.com
William B. Stafford — wstafford@perkinscoie.com
Rhonda L. Barnes — rbarnes@perkinscoie.com

I declare under the penalty of perjury under the laws of the State of Indiana that the above is true
and correct.

Executed this 9th day of August, 2011.

/s/ Jared Haynie
Jared Haynie
Counsel for All Plaintiffs

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